

RE:

CLAPP V. Baker



Mr. Kevin S. Clapp
79 Brookville Ave
Brockton, MA 02302

Civil Action #18-10426-ADB

ALL other Attorneys

Sent by 1st Class mail

Postage Pre-paid



November 14, 2020

Sent VIA overnight mail To
DR Giella, Ph.D. and Atty Joe Donnellon

I Kevin S. Clapp D.O.B. 8/12/59 Due herby
authorize The following Attorneys to Review all
notes being provided by my Doctor Paul Giella, Ph.D
DR Giella Requested this Authorization as a must
because unlike the Deposition, The Medical Release
only gives permission to Joseph G. Donnellon, Rogal and
Donnellon, P.C. 100 River Ridge Drive, Suite 203 Norwood, MA 02062
and no other Attorneys, This medical
File is protected under State Laws and Federal Laws,
"HIPPA" Protected, At No time shall Any Attorney
make copies or any type of Reproduction of such
medical Notes to Give or Let Read to there clients

- ① Attorney Joseph G. Donnellon
- ② Attorney Brian Rogal
- ③ Attorney Daniel J. Moynihan
- ④ Attorney Mark A. Russell
- ⑤ Attorney Lorena Galvez
- ⑥ Attorney Joseph Kittredge
- ⑦ Attorney David J. Officer
- ⑧ Attorney Michael J. Akerson

FILED
IN CLERKS OFFICE
2020 NOV 18 PM 12:35
U.S. DISTRICT COURT
DISTRICT OF MASS.

So Allowed by The Pro-se Plaintiff Kevin S. CLAPP

Dated 11-14-2020

Kevin S. Clapp

C.C. The Honorable Justice Allison D. Burroughs

Clapp v. Baker. DR. # Civil # 18-70926 ADB

* PER DR. Paul Giella Please Read Attached *

AUTHORIZATION TO RELEASE
MEDICAL RECORDS
AND RECORDS PROTECTED BY HIPPA
AND TO PARTICIPATE IN A DEPOSITION

Patient's Name: KEVIN CLAPP Date of Birth: August 12, 1959

Medical Provider: Paul Giella, Ph.D.
34 Oak Road
Milton, Massachusetts 02186

Dates of Treatment: This release applies to all treatment that I have received from the below medical provider up through to the date this release is presented.

Effective Date: This release shall be valid for a period of one year from the date written below unless I revoke it in writing as set forth below.

Scope of Release: This release pertains to all records and bills pertaining to my treatment by Paul Giella, Ph.D., his employees, agents and affiliated health care providers, their agents, employees and representatives, including, but not limited to, records pertaining to mental health and drug, alcohol and substance abuse treatment.

I authorize Paul Giella, Ph.D., his agents, employees and representatives, to release any and all medical records pertaining to me to: Joseph G. Donnellan, Rogal & Donnellan, P.C., 100 River Ridge Drive, Suite 203, Norwood, Massachusetts 02062. I further authorize Paul Giella, Ph.D. to participate in a deposition conducted in connection with a lawsuit that I have brought in the United States District Court for the District of Massachusetts and captioned as Clapp v. Baker, et al., 1:18-cv-10426-ADB.

The purpose of this release is to obtain records and to authorize my provider to participate in a deposition in a legal proceeding that I am involved in. I authorize the use of a copy of this release to the same extent as an original.

I understand that the information described above may be redisclosed by the authorized recipients, except as precluded by law. Records that are disclosed are no longer be protected by the federal privacy regulations. I understand that I may revoke this authorization by notifying the provider, in writing, knowing that previously disclosed information would not be subject to my revocation request. I understand that I may refuse to sign this authorization and that my refusal to sign will not affect my ability to obtain treatment, payment or eligibility for benefits.

Date: 11-10-2020 Kevin Clapp

* Depo. to be
Re-scheduled for Nov.
for All Parties to
Be Available

Ctrl.
11/13/20
Depo.

TO
short
of
notice
with

Paper
work
needed

C.C. The Honorable Justice
Alison D. Berraghs

-Signed under
The Conditions agreed
That no notes shall
be copied or given to
any Defendants